

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

MICHAEL AMOS, PITRELL BRISTER,
ANTONIO DAVIS, WILLIE FRIEND, CHARLES
GAYLES, DANIEL GUTHRIE, JONATHAN J.
HAM, DESMOND HARDY, BILLY JAMES, JR.,
JUSTIN JAMES, QUENTEN JOHNSON,
DEAUNTE LEWIS, LARRY MAXWELL,
TERRANCE MCKINNEY, DERRICK PAN,
BRANDON ROBERTSON, KURIAKI RILEY,
DERRICK ROGERS, TYREE ROSS, H.D.
ALEXANDER SCOTT, DEANGELO TAYLOR,
LEMARTINE TAYLOR, CONTI TILLIS,
DEMARCUS TIMMONS, CARLOS VARNADO,
PHILLIP DECARLOS WEBSTER, ADRIAN
WILLARD, CURTIS WILSON, CALEB
BUCKNER, WILLIAM GREEN, ARIC
JOHNSON, IVERY MOORE, and KEVIN
THOMAS, on behalf of themselves and all other
similarly situated,

Plaintiffs,

v.

TOMMY TAYLOR, in his official capacity as the
Interim Commissioner of the Mississippi
Department of Corrections, and MARSHAL
TURNER, in his official capacity as the
Superintendent of the Mississippi State
Penitentiary,

Defendants.

Case No. 4:20-CV-007-DMB-JMV

LEAD PLAINTIFFS' MOTION TO COMPEL EXPEDITED DISCOVERY

COME NOW Lead Plaintiffs listed above, by and through undersigned counsel, and pursuant to Rule 37 of the Federal Rules of Civil Procedure respectfully request that this Court compel expedited discovery as described in the attached Memorandum of Law.

In support of their motion, Lead Plaintiffs respectfully submit their accompanying Memorandum Brief and the following exhibits:

EXHIBIT A: Declaration of Attorney Marcy B. Croft

EXHIBIT B: Email from M. Croft to T. Jones on January 29, 2020

EXHIBIT C: Declaration of Jeworski Mallet [Doc 17-1]

EXHIBIT D: Declaration of John G. Sprayberry [Doc 17-1]

EXHIBIT E: Declaration of Sean Smith [Doc 17-1]

EXHIBIT F: Emails between M. Croft and T. Jones

EXHIBIT G: Declaration of Attorney Casey L. Austin re: repairs

EXHIBIT H: Declaration of Attorney Casey L. Austin re: hanging

EXHIBIT I: Spoliation Letter dated January 29, 2020

EXHIBIT J: Declaration of Eldon Vail;

EXHIBIT K: Declaration of Craig Haney;

EXHIBIT L: Declaration of Marc Stern;

EXHIBIT M: Declaration of Madeleine LaMarre;

EXHIBIT N: Declaration of Frank Edwards;

EXHIBIT O: Declaration of Debbie Graham; and

EXHIBIT P: Declaration of Terry Kupers.

WHEREFORE, PREMISES CONSIDERED, Lead Plaintiffs respectfully request that this Court grant their Motion to Compel Expedited Discovery. Lead Plaintiffs further request any other relief to which they may be entitled.

Date: February 1, 2020

Respectfully submitted,

/s/ Marcy B. Croft

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing was filed this day via ECF which automatically serves a copy on all counsel of record, including counsel for the Defendants.

/s/ Marcy B. Croft
Marcy B. Croft (MS Bar #10864)